

UNITED STATES DISTRICT COURT

for the

District of

Division

Case No.

1:24 CV 694
(to be filled in by the Clerk's Office)

Joseph Gibson

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Doranne Parnell
Stephen Wiley
Anti Def League

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No



COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Joseph Gibson
264 Red Oak Drive
Stokesdale Rockingham
NC 27357

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Diane Parnell

220 Woodlyn Drive
Reidsville Rockingham
North Carolina 27320

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Stephen Wiley

1506 Hillsborough ST
Raleigh
North Carolina 27605

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Anti Def League

605 Third Ave
New York
New York 10158-3650

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- ☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

See Attached

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the
State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

See Attached

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 8-11-2024

Signature of Plaintiff

Printed Name of Plaintiff


Joseph Gibson

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

**UNITED STATES DISTRICT COURT OF THE EASTERN DISTRICT OF
NORTH CAROLINA**

JOSEPH A GIBSON, Plaintiff,

Case No; _____

v. Dianne Parnell, Stephen Wiley, and The Anti-Defamation League (ADL), Defendants.

COMPLAINT

I. Jurisdiction and Venue

This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1332, as the parties are from different states and the amount in controversy exceeds \$75,000. The Plaintiff, Joseph A. Gibson, is a resident of North Carolina, while the Defendants are residents of different states. This Court also has jurisdiction under 28 U.S.C. § 1331, as the case involves federal questions, including defamation and civil rights violations under federal law. The venue is proper in this district under 28 U.S.C. § 1391 because a substantial part of the events giving rise to the claims that occurred in this district. Also, action drawing into question the constitutionality of a federal or state statute filed under (Rule 5.1). Rule 5.1 implements 28 U.S.C. § 2403.

II. Introduction

Plaintiff, Joseph A. Gibson, a candidate for the North Carolina House of Representatives District 65 in the 2024 Republican primary, brings this action against Defendants Dianne Parnell, Stephen Wiley, and The Anti-Defamation League (ADL) for false and defamatory statements, libel, and civil rights violations.

In 2022, the ADL published an article falsely claiming that Plaintiff is a member and supporter of the National Socialist Movement (NSM), a Neo-Nazi group based in Florida. The article alleged that the NSM supported Plaintiff and that he was one of their members solely based upon a screenshot on the Telegram channel .In January 2024, Defendants Parnell and Wiley conspired to have Joseph Gibson

The plaintiff removed from the North Carolina election ballot by falsely claiming that The plaintiff had no citizenship rights to serve as a public official due to a felony conviction in Connecticut. 30 years ago This issue was not raised during the 2022 primary when The plaintiff was also on the ballot.

In January 2024, the Rockingham County Board of Elections and the North Carolina State The Board of Elections cleared Plaintiff, confirming he had full citizenship rights and was eligible to run for office.

Following this ruling, Defendants Parnell and Wiley gave numerous press interviews, falsely stating that Plaintiff had no citizenship rights. Defendant Wiley, in a TV interview with WRAL called Plaintiff a liar, anti-government extremist, and Neo-Nazi, further claiming that Democrats in Rockingham County supported Plaintiff to portray Republicans as Neo-Nazis. The plaintiff has suffered irreparable harm, significant psychological damage, and stress due to Defendants' actions, which have slandered his character and reputation. Defendants' actions have violated Plaintiff's First fourteenth Amendment rights under the U.S. Constitution and the North Carolina State Constitution. The Plaintiff publicly in press statements requested the defendants retract their statements and even had written to all 3 defendants requesting these statements be withdrawn No response was ever received

III. Claims for Relief

Defamation and False Statements: Defendants' statements were made with actual malice or reckless disregard for the truth, constituting defamation under federal law and State laws.

Election Fraud and False Statements: Defendants conspired to remove Plaintiff from the election ballot based on false information, violating federal laws related to election fraud.

Civil Rights Violations: Defendants' actions violated Plaintiff's civil rights under Section 1983 of the Civil Rights Act by interfering with his right to run for public office and participate in the electoral process.

Prayer for Relief

Plaintiff respectfully requests Court: For Jury Trial

Award compensatory in the Amount of \$1,000,000 and punitive damages in the amount to\ be in the amount of 1,000,000

Grant injunctive relief to prevent further defamatory statements by Defendants.

Award Plaintiff's attorneys' fees and costs and Nominal relief of \$1.00

Grant any other relief the Court deems just and proper.

Dated: 08-11-2024

Joseph Gibson

Respectfully submitted

